

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
(Alexandria Division)**

|                                      |   |                                 |
|--------------------------------------|---|---------------------------------|
| <b>UNITED STATES OF AMERICA</b>      | ) |                                 |
|                                      | ) |                                 |
| <b>v.</b>                            | ) | <b>Case No. 3:12-cr-137-AJT</b> |
|                                      | ) |                                 |
| <b>KOLON INDUSTRIES, INC.,</b>       | ) |                                 |
| Including and through its successors | ) |                                 |
| “Kolon Industries, Inc.” and “Kolon  | ) |                                 |
| Corporation”                         | ) |                                 |
| <b>JONG-HYUN CHOI,</b>               | ) |                                 |
| <b>IN-SIK HAN,</b>                   | ) |                                 |
| <b>JU-WAN KIM,</b>                   | ) |                                 |
| <b>KYEONG-HWAN RHO,</b>              | ) |                                 |
| <b>YOUNG-SOO SEO,</b>                | ) |                                 |
|                                      | ) |                                 |
| <b>Defendants.</b>                   | ) |                                 |
|                                      |   |                                 |

**KOLON INDUSTRIES, INC.’S MOTION FOR LEAVE TO APPEAR SPECIALLY**

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*Attorneys for Specially-Appearing Defendant  
Kolon Industries, Inc.*

PLEASE TAKE NOTICE that counsel for Specially-Appearing Defendant Kolon Industries, Inc. (“Kolon”)<sup>1</sup> hereby requests that the Court grant Kolon leave to appear specially at the October 24, 2014 status conference for the limited purpose of addressing this Court’s jurisdiction over Kolon, including issues related to the Government’s service attempts. This Motion is made on the grounds set forth in the accompanying Memorandum.

Respectfully submitted this 16th day of October, 2014.

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<sup>1</sup> “Kolon” refers to Kolon Industries, Inc. and any Kolon entity that the Government contends is both a party and the subject of the Government’s service efforts in the above-captioned action. The Superseding Indictment is fatally ambiguous as to the named defendant(s).

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 16th day of October, 2014, I electronically filed the foregoing document, entitled Kolon Industries, Inc.'s Motion for Leave to Appear Specially, with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to counsel named below:

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